

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS

DIVISION OF ST. CROIX

ATLANTIC BASIN REFINING, INC.,

Plaintiff,

v.

ARCLIGHT CAPITAL PARTNERS, LLC and JP
ENERGY PARTNERS, LP,

Defendants.

Case No. 1:15-cv-00071-WAL-EAH

JOINT STATUS REPORT

At the October 4, 2022, Status Conference, the Court ordered the parties to meet and confer “on whether these two individuals [Robert Moore and John Thomas] can be deposed and the scope of that deposition[.]” Oct. 4 Hr’g Tr. 63:5-7 (**Ex. A**). The Court further ordered the parties to “determine when these two individuals can be deposed, under what scope they can be deposed, and what additional information would be necessary [] for you all to bring some closure to this.” *Id.* at 64:21-24. The parties corresponded by email (**Ex. B**) and then conferred by phone on October 7, 2022.

The parties were unable to reach an agreement as to the scope of those depositions or the scope of additional document and written discovery. Accordingly, the parties ask that the Court set a briefing schedule for same, while staying the current schedule (including the now-past deadline for depositions of ABR’s experts of October 7, 2022, and the upcoming deadline for Defendants’ damages report on October 28, 2022 (ECF. No. 319)). The parties propose the following:

- **October 28, 2022 at 5 p.m. AST:** Each party submits an opening memorandum setting forth its position on further discovery.
- **November 7, 2022 at 5 p.m. AST:** Each party may submit a reply that is limited to

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responding to the other party's opening memorandum.

Dated: October 17, 2022

Respectfully Submitted,

RASCO KLOCK PEREZ NIETO

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By: /s/ Charles E. Lockwood

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